

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

BRAINCHILD SURGICAL DEVICES, LLC,
a New York limited liability company, on
behalf of themselves and those similarly
situated,

Plaintiff,

v.

CPA GLOBAL LIMITED a foreign entity
formed under the laws of the Island of Jersey,
Channel Islands,

Defendant.

Case No. 1:21-cv-00554-RDA-JFA

**DEFENDANT CPA GLOBAL LIMITED'S EXPEDITED MOTION FOR A
PROTECTIVE ORDER**

Defendant CPA Global Limited, by counsel, pursuant to Federal Rule of Civil Procedure 26 respectfully moves this Court for a protective order that it is not required to collect and produce custodial documents for Simon Webster, Tim Griffiths, Steen Lomholt-Thomsen, or Yves Sibre, or any additional custodians identified by Plaintiff Brainchild Surgical Devices, LLC. A statement of the facts and law supporting the granting of this motion is set forth in the memorandum filed herewith, and a proposed order granting this motion is filed as an exhibit hereto.

Dated: June 15, 2023

Respectfully submitted,

/s/ Eric C. Lyttle

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CERTIFICATE OF SERVICE

I hereby certify that on the 15th day of June, 2023, I filed the foregoing document electronically with the Clerk of the Court using the ECF system, and caused to be served by electronic mail a copy of the foregoing document upon the following parties:

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